

United States District Court

DISTRICT OF Delaware

UNITED STATES OF AMERICA

V.

Scott T. Robinson

w/m

DOB: [REDACTED]

REDACTED

CRIMINAL COMPLAINT

CASE NUMBER: 07-104 M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 11-1-06 to 2-16-07 in Kent county, in the

District of Delaware defendant(s) did, (Track Statutory Language of Offense)

knowingly receive, distribute and possess child pornography which had moved in interstate and foreign commerce through the internet

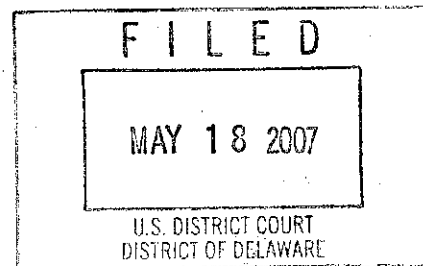
in violation of Title 18 United States Code, Section(s) 2252A

I further state that I am a(n) FBI Special Agent and that this complaint is based on the following

Official Title

facts:

see attached affidavit



Continued on the attached sheet and made a part hereof:

☒ Yes ☐ No

SA Duffey
Signature of Complainant
SA Scott A. Duffey, FBI

Sworn to before me and subscribed in my presence,

Date

May 17, 2007
Honorable Mary Pat Thyng
United States Magistrate Judge

Name & Title of Judicial Officer

at

Wilmington, DE

City and State

[Signature]
Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, Scott A. Duffey, a Special Agent with the Federal Bureau of Investigation (FBI), Baltimore Division, Wilmington, Delaware Resident Agency, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent of the FBI since 1997 and am currently assigned to the Baltimore Division, Wilmington, Delaware Resident Agency.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. All information contained in this affidavit is either personally known to the Affiant or has been related to the Affiant by other Special Agents of the Federal Bureau of Investigation and Detectives of the Delaware State Police. Since this affidavit is being submitted for the limited purpose of securing an arrest warrant, I have not included each and every fact known to me concerning this investigation.

4. On February 16, 2007, your Affiant participated in the execution of a search warrant at the residence of Scott T. Robinson at [REDACTED] Camden-Wyoming, Delaware. Also participating in the search was SA Taneka Harris, FBI, SA Peter Lapp, FBI, and Detective Steve Whalen, DSP High Technology Crimes Unit. The affidavit of SA Harris in support of that search warrant application reads, in part, as follows:

BACKGROUND OF THE HOUSTON INVESTIGATION

32. [On February 16, 2006, a] search warrant was executed at the residence of [a Houston Texas resident.] A review of one of the computers found at the residence revealed over 8,600 images and 59 movies of child pornography. A large amount of child pornography images and movies contained on the computer

were obtained via the "hello" program from other "hello" users.

33. An administrative subpoena was issued to Google for user account information and IP address login information for the "hello" users communicating with [the Houston resident], which revealed Google User ID: [REDACTED] which correlated to Google Handle: [REDACTED]. An administrative subpoena for Google Handle [REDACTED] returned the email address: [REDACTED]. The search of [the Houston resident's] computer indicated receipt of child pornography pictures from Google Handle [REDACTED] on July 10, 2006 at 06:36:22 EDT. Google, Incorporated, advised that the IP Address assigned to User Handle [REDACTED] at the aforementioned date and time was [REDACTED]. According to the results of an Administrative Subpoena to Comcast, IP Address [REDACTED] used on July 10, 2006 at 06:36:22 EDT revealed the following subscriber information: Subscriber Name: Scott Robinson; Address: [REDACTED] Camden, Delaware 19934 (subscriber's service address); Telephone: [REDACTED]. Type of Service: Residential high speed internet service; Account Status: Active; IP Assignment: Dynamically assigned; Account Created: 02/14/2001; Account Number: [REDACTED] E-mail User Ids: [REDACTED].
34. The examination of [the Houston resident's] computer revealed more than 800 images and one video depicting child pornography received from "hello" user [REDACTED]. Your affiant has reviewed all of the images and the video, and describes fives images as follows:
- a. [REDACTED].jpg (adult man performing oral sex on a prepubescent female)
 - b. [REDACTED].jpg (prepubescent boy masturbating an adult male)
 - c. [REDACTED].pg (adult male performing anal sex on a prepubescent boy)
 - d. [REDACTED].jpg (baby boy performing oral sex on an adult male)
 - e. [REDACTED] (adult male performing sex on a prepubescent boy)

* * *

BACKGROUND OF THE INDIANAPOLIS INVESTIGATION

* * *

37. FBI - Indianapolis executed a search warrant [in approximately December 2006] at [an Indiana resident's] home. A forensic examination of [his] computer was conducted in order to determine if other persons were trading child pornography with [the Indiana resident.]

In the process, forensic evidence indicated that [the Indiana resident] traded child pornography files through the Internet via the "Hello" program with user identification number [REDACTED]. Subpoenas served upon Hotmail - MSN and Comcast revealed that user number [REDACTED] indicated the following: handle name - [REDACTED] email address - [REDACTED] Comcast subscriber - SCOTT ROBINSON, [REDACTED] [REDACTED] Camden-Wyoming, Delaware 19934.

38. FBI - Indianapolis with the assistance of Indiana State Police (ISP) recovered a "Hello" chat log related to the trading activity between [the Indiana resident] and [REDACTED] (ROBINSON) as well as over 900 visual depictions of minors engaging in sexually explicit conduct, including very young and prepubescent children. Within the 900 images sent by [REDACTED] (ROBINSON), approximately 7 images were categorized by the forensic examiner as depicting sexual violence. Your affiant has reviewed all of the images and describes five images as follows:
- a. [REDACTED] (infant performing oral sex on an adult male)
 - b. [REDACTED].jpg (toddler boy performing oral sex on an adult male)
 - c. [REDACTED].jpg (prepubescent girl performing oral sex on an adult male)
 - d. [REDACTED].pg (prepubescent girl with seamen in her mouth pictured with two naked males with their penis' exposed)
 - e. [REDACTED].jpg (prepubescent girl performing oral sex on an adult male)
39. a. The FBI has searched various record databases for information about Scott Robinson. Delaware State Department of Motor Vehicles' records, both vehicle and drivers licence, for Scott Robinson indicated an address of [REDACTED] Camden, Delaware 19934.
- b. On January 30, 2007, a request was issued to the United States Postal Inspection Service requesting mailing information for [REDACTED] Camden, Delaware 19934. The results of the request verified that mail is being delivered to Scott Robinson, [his wife and step-son] at [REDACTED] Camden, Delaware 19934.

5. On February 16, 2007 the search executed the search warrant at Scott Robinson's above specified home. Two occupants were found inside the residence, Scott Robinson and his

wife. Four computers and one laptop were located within an upstairs bedroom. Scott Robinson declined to interview with investigators. During the search SA Lapp was in the dining room with Scott Robinson and his wife. SA Lapp heard the wife whisper to Scott Robinson, "How many?" In a whisper, Scott Robinson responded, "Just the one." SA Lapp heard further whispering between Scott Robinson and his wife but the conversation was not loud enough to distinctly hear words. Approximately one minute later, the wife lost consciousness and fainted to the floor of the dining room.

6. At the conclusion of the search warrant the 4 CPUs and one laptop were turned over to Detective Whalen, DSP. He transported them to the DSP High Technology Unit where they later were searched by Detective Whalen, a forensic expert in the examination of computers. Detective Whalen wrote a report, dated May 15, 2007, in which he reports, in part the following:

Examination of the forensic images of the above [five] computers... revealed a large amount of child pornography images and erotica (12,000+) and several child pornography videos. The majority of the child pornography was located on the... laptop.... Evidence shows that most of the images of child pornography on the laptop were obtained via the use of Google, Hello chat and file sharing application. Examination shows that the user of this application engaged in multiply chats and exchanged child pornography with no less than 21 individuals. During the trading of images and videos the participant held discussions that focused on sexually assaulting children.

* * *

Examination of the media revealed 1,000+ images of suspected child pornography and erotica found on the... laptop within the allocated space. Allocated space is the area of the hard drive that is currently used to store active files. Many of the images were organized into categorized folders with names that describe the types of photos they contained. Some examples of the folders names are:

- BJs
- Cartoons
- Fuck
- Showoff

The majority of these images contained pictures of children engaged in prohibited in sexual acts ranging from infant through post-pubescent.

In addition to the images found in the allocated space over 11,100+ images were recovered from the unallocated space.... Files recovered from the unallocated space are usually ones that have been deleted by the user or purged by the operating system.

* * *

Eight videos of suspected child pornography were located on the laptop. Two of the videos were found in the recycle bin, they were found in deleted folders named, "my receive files" and the remainder three videos were found under Scott Robinson's user folder in the path:...\\ScottRobinson\\MyDocuments\\Hello [REDACTED]....

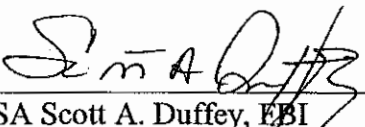
* * *

Three web bases email accounts believed to be used by Scott Robinson were located. . . .

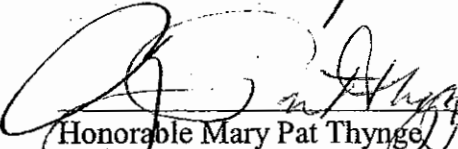
The three accounts [included] [REDACTED]

7. Your affiant has reviewed approximately 10 of the Google Hello chats referenced in Det. Whalen's report. The chats are dated from November 1, 2006, through February 15, 2007, the day before the search warrant was executed..

8. Based on the above, your affiant respectfully submits that there is probable cause to believe that Scott T. Robinson has distributed, received and possessed child pornography in violation of 18 U.S.C. § 2252A.


SA Scott A. Duffey, FBI

Sworn and subscribed before me
this 17 day of May


Honorable Mary Pat Thyng
UNITED STATES MAGISTRATE JUDGE